

SHER TREMONTE LLP

MEMO ENDORSED

March 20, 2025

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/21/2025

Re: *United States v. Adama Sow*, 23 Cr. 593 (VEC)

Dear Judge Caproni:

We represent Adama Sow, the defendant in the above-referenced action. We write to respectfully request an adjournment of Ms. Sow's deadline to submit her sentencing submission, from March 21, 2025 to April 4, 2025.

At the *Fatico* hearing that took place February 11-12, 2025, the Court ordered that all sentencing submissions be submitted by March 21, 2025. *See* ECF 48. We understand that the government intends to rely heavily on certain records that were introduced in evidence during the *Fatico* hearing in its sentencing submission. However, these records were not presented to any witnesses, and the defense remains unaware of what arguments the government will make using these records. Ms. Sow respectfully requests that the Court order the parties to file their sentencing submissions sequentially (rather than simultaneously), so that Ms. Sow has adequate notice of the government's arguments and may respond to them in her own sentencing submission. Accordingly, Ms. Sow requests that her deadline to file her sentencing submission be adjourned by two weeks, to April 4, 2025.

Alternatively, if the Court would prefer to maintain the simultaneous submission schedule, Ms. Sow respectfully requests an adjournment for both parties to file their sentencing submissions until April 4, 2025.

This is our first request for an adjournment of the deadline to submit Ms. Sow's sentencing submission. The government opposes our request to file Ms. Sow's sentencing submission sequentially to the government's submission, given the government's view that Ms. Sow is no more disadvantaged than the government by the simultaneous filing of sentencing submissions. The government consents to requesting a two-week adjournment for both parties to file their submissions.

Hon. Valerie E. Caproni
March 20, 2025
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Respectfully submitted,

/s/ Justine A. Harris

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Alexandra Conlon

Attorneys for Adama Sow

cc: AUSA Henry Ross (by ECF)
AUSA Sarah Mortazavi (by ECF)

Application GRANTED IN PART. The deadline for both parties to file their sentencing submissions is ADJOURNED to **Friday, April 4, 2025**. The parties may file responses to the opposing side's submission not later than **Friday, April 11, 2025**. No further extensions will be granted.

SO ORDERED.

 3/21/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE